

COMMENTS OF GREATER MEDIA, INC.

A. INTRODUCTION

Greater Media, Inc., through subsidiary licensees, has been a broadcast licensee for 40 years, operating both AM and FM stations in communities large and small across the United States. Today, Greater Media operates a total of 19 AM and FM stations in Boston, Massachusetts; Philadelphia, Pennsylvania; Detroit, Michigan; and several communities in New Jersey. Each of Greater Media's radio stations is dedicated to local management, programming, and public interest activities. We strive to provide programming that is responsive to the unique interests and needs of the communities to which our stations are licensed. We believe this is the greatest strength and promise of terrestrial radio.

Under these circumstances, Greater Media is well qualified to comment on broadcast localism. Greater Media has dedicated itself over the past 40 years to the advancement of local causes, and the preservation of the local character and commitment of broadcast radio. Greater Media's comments below address specific issues raised in the Commission's Notice of Inquiry.

B. COMMUNITY PROGRAMMING AND PUBLIC AFFAIRS

Greater Media has found that through a combination of self-designed ascertainment procedures, listener and community outreach, and an open line of communication with our listeners, our stations are well-informed about the interests and concerns of the communities we serve. Responding to these interests and concerns is a critical component in attracting and maintaining a loyal listener base, which is in turn critical to our success in generating advertising revenue.

Greater Media's stations engage in a multi-pronged approach to determine the problems, needs, and interests of their communities. First, the stations regularly solicit input from listeners regarding issues of interest and importance to the community, both through on-air announcements and on the station websites. Listener suggestions are communicated by e-mail, regular mail, and phone. (E-mail received from listeners is answered by the stations' program directors whenever possible, while direct e-mail to on-air personalities is answered by the specific addressee. Any e-mail relating to a station's operations is duly forwarded to the station's public file.) Second, many of the stations conduct regular polls and research on their websites, including seeking listener opinions about news and public affairs programming and events. Third, many stations invite community leaders to suggest topics of importance to their constituents, or ask station members to participate in local community organizations such as local Chambers of Commerce to get a better idea of local concerns. In addition, station management and on-air personnel regularly monitor a number of news sources for topics of importance and for breaking news. For example, at station WJRZ in Manahawkin, New Jersey, the news department creates a weekly datebook of local newspaper clippings and faxes from civic and charitable organization to determine the types of interviews and programs that it will air.

Each of our stations broadcasts daily programming that provides current news, weather, and traffic information. This information is obtained from local and national services, as well as in-house monitoring of major news sources, and is delivered by local on-air personnel. News and weather updates generally are broadcast every half-hour during prime morning drive hours, ranging from 20-35 reports per station per week. Many stations include afternoon updates, stock

reports, and breaking news. News reports offer listeners up-to-the-minute information on local, national and international events, and also focus on issues of concern to our listeners, including the economy, environment, health, and lifestyle. Each report is live, delivered with the latest weather forecast and current weather conditions. News reports also include information on sports events of interest to the local community. Our investment in this type of news reporting is substantial: in Detroit, for example, local news reporting for three stations has an annual value of over \$500,000.

Our traffic reports provide listeners with the latest information on accidents, road hazards and slowdowns, and offer alternative routes around problem areas. Each report covers major transportation routes in and around the metropolitan area and, if applicable, also covers routes used for interstate travel between adjacent states. Traffic reports occur frequently during the peak morning drive hours and occasionally during afternoon drive as needed.

Our news/talk stations broadcast continuous programming designed to inform and provoke thought among our listeners, including talk shows featuring local personalities such as Margery Egan, Jim Braude and Mike Barnicle in Boston (WTKK), and Jay Sorenson and Jack Ellery in Central New Jersey (WCTC-AM).

In addition, each station broadcasts weekly public affairs programming that addresses specific topics of interest to the community. Although the majority of our public affairs programming is produced locally in the station's community, we find that our listeners have many interests and concerns that are more universal. For this reason, our public affairs programming includes nationally syndicated programs that address specific issues of concern to our audience, such as women's health, parenting, and financial planning. We believe these programs provide important and current information that may not otherwise be readily available to our listeners. Examples of Greater Media's public affairs programming include:

 WMJX, licensed to Boston, Massachusetts, airs two locally-produced public affairs programs each week. Boston Life, a 30-minute show hosted by WMJX news director Gay Vernon, comprises long-form interviews with local community and political leaders. Exceptional Women, a 30-minute show hosted by Ms. Vernon and WMJX's assistant program director Candy O'Terry, includes long-form interviews with local and non-local women whose accomplishments are an inspiration to WMJX listeners.

 WBOS, licensed to Brookline, Massachusetts, maintains a strong commitment to community issues and concerns through its radio program Greater Boston Today, a locally originated public service program that airs weekly. WBOS actively seeks listener input regarding issues raised during Greater Boston Today, and also solicits listener's comments, concerns and critiques with on-air announcements and during station events. WBOS uses listener input, along with monitoring of local and regional newspapers and TV and radio broadcasts, to identify local issues and concerns. WBOS contacts community religious and political leaders in Brookline by mail to specifically seek their input regarding issues of importance to the community. WBOS also airs The Parent's Journal, a 30-minute weekly program devoted to issues about raising children in a healthy, supportive environment.

 WMGC, licensed to Detroit, Michigan, airs four weekly public affairs programs, including:

 Ask the Professor, a 30-minute program produced by the University of Detroit Communications Department, consists of a rotating panel of University

professors answering questions submitted by the radio audience via mail. Each show addresses numerous Detroit community concerns including the economy, the environment, race relations, media, health, science, business and labor.

 CounterSpin, a 30-minute program produced by Fairness and Accuracy in Reporting (FAIR), provides WMGC listeners with an analysis of how the news is presented. Guests discuss media bias, whether based on race, class, gender or other factors, which deters from the objective presentation of news about current events and contemporary topics.

 The Peter Werbe Show, a one-hour program written, produced and hosted by Greater Media Detroit's Public Affairs Director, expressly addresses issues of public concern as determined by our ongoing process of ascertainment. Each week, Mr. Werbe interviews community leaders, experts in a variety of fields, authors, government officials, media personalities, charity and volunteer workers, and people working in various organizations to improve community and political life. These interviews also serve as part of the process for collecting the views of the guests for future shows.

 Living For You, a 30-minute program that explores issues surrounding women's physical, mental and emotional health. The host, Mary Rahmann, shares her vast knowledge with the audience, and also talks with many health leaders, authors and experts to keep women up to date on these issues. (Women comprise the majority of WMGC's audience.)

Our stations also include regular programming features designed to inform their listeners about local events of interest. For example, on WMMX in Philadelphia, the station broadcasts The Weekend Update each Friday, providing a list of local events including fundraisers, charity walks, and other events happening within the community that might be of interest to our listeners. WMMX also conducts frequent on-air interviews with local personalities on topics such as health, safety, and charitable events, including:

 Liz and Jay Scott - the Wynnwood, Pennsylvania parents of Alex Scott, a young girl diagnosed with cancer who started a lemonade stand to raise money for cancer research. Alex's efforts led to the creation of lemonade stands across the country which eventually raised close to a million dollars. WMMX hosted Alex's parents twice to promote a lemonade stand event.

 A doctor from the University of Pennsylvania regarding new findings in breast cancer research.

 Two representatives from The Crohns and Colitis foundation discussing "Sippin' By The River," an event to raise money for Crohns and colitis research.

 Anita Brickman, Chairperson for The Walk against Breast Cancer and a Health reporter for ABC's Channel 6, urging listeners to participate in the Walk.

 Amy Freeze, a weather reporter for NBC10, discussing incoming hurricanes and the steps to take to prevent damage.

Station WJRZ in New Jersey airs three to five local public affairs interviews per week, approximately four to five minutes in length, on weekday mornings at 7:40 or 8:40. Recent topics included detecting and preventing skin cancer, Jackson and Brick Township's "Night out against Crime," the American Red Cross "Rock and Ride Bike Tour" on Long Beach Island, and the Ocean County

Health Department's "Pretty in Pink" Day in support of the fight against Breast Cancer.

The morning show on WROR in Boston frequently broadcasts information and announcements about local museum openings, special events and engagements at local cultural centers, area fairs, theatre events, and fire and police outreach programs. These events are also frequently featured in station PSAs if they are charitable in nature.

Our stations air hundreds of public service announcements (PSAs) each week. For example, WJRZ airs approximately 20 different PSAs each week in equal rotation, once per hour in morning drive and once per daypart during the rest of the day. PSAs are chosen from faxes and mail received from the community as a result of daily on-air solicitation. PSA topics include health screenings, blood drives, and community fund raising. The announcements are also posted on the station website. WROR (Boston) airs at least one PSA per shift per daypart, 24 hours a day. WPEN-AM (Philadelphia) airs 30-second PSAs daily on a run-of-schedule basis. Stations also broadcast PSAs on general topics, such as WROR's promotion of free mammogram clinics during National Breast Cancer Awareness Month, and provision of information about food and blood drives for victims of natural disasters. The WMWX Morning Show also discussed and supported several events during Breast Cancer Awareness Month in October. The morning newscaster on WRAT (New Jersey) promotes a local charitable or community event before each newscast, for approximately five live mentions per day, five times per week. Topics include local blood drives, food collections, benefits for those with serious or life threatening ailments, and voter registration campaigns. All items are also included on the WRAT website's "PSA Page".

Greater Media stations air promotional announcements and live broadcasts from numerous civic and fundraising events, such as local fairs and charity races. WROR (Boston) has established an annual tradition of broadcasting the morning show live from a local firehouse during the week before Thanksgiving. Each year, WROR coordinates with local sponsors to donate a product or service the firehouse needs, including new ovens, furniture, or a gift certificate for building products. In July 2004, following devastating floods that affected several residential areas in New Jersey that are a part of the WMGK listening area, afternoon drive host Andre Gardner broadcast live from Marlton, New Jersey, and raised over \$7,000 for flood victims. This November, John DeBella and WMGK will again hold the annual Turkey Drop, broadcasting live from community locations and collecting turkeys to be donated to City Team Ministries to help feed the homeless and needy in Philadelphia at Thanksgiving.

Some of our stations broadcast "radiothons" to promote and raise funds for local non-profit organizations, such as the WPEN (Philadelphia) radiothon to benefit the non-profit Philadelphia Corporation for Aging, an organization that supports seniors in the Philadelphia area; and the WCSX (Detroit) radiothon to benefit the Children's Leukemia Foundation of Michigan. For the last four years, WRAT in New Jersey has conducted the "Broadcast for the People of New Jersey," a charity drive during which the station conducts a live broadcast starting at 6 a.m. from a 44-foot tractor trailer parked outside a sponsor location. The broadcast continues until the truck is filled with used clothing for the Family Resource Associates, non-perishable food items for the Monmouth Ocean Food Bank, and stocking stuffer items for the Holiday Express. Each year, the truck is filled within two days.

Other stations feature special programming with similar civic and charitable goals. For example, WROR broadcasts an annual "Salute the Troops"

weekend, during which local listeners call with well-wishes for their loved ones serving in the military overseas. WROR records these messages and sends them to the listeners so they can share them with the soldiers. WROR also enjoyed a partnership with Red Sox pitcher Curt Schilling during the 2004 baseball season, in which Mr. Schilling was a weekly call-in guest to the WROR morning show, offering his insights on baseball and promoting his fight against ALS (Lou Gehrig's disease). WROR's partnership with Curt Schilling raised approximately \$115,000 this year for the ALS Association. WMMR in Philadelphia broadcast a two-hour special on September 11, 2004 honoring the memory of those private and public workers killed in the attacks of September 11, 2001. The program was a historical retrospective on the events of that day, including the importance and impact of volunteering time and resources to charities and causes of all kinds. On September 26, 2004, WMMR aired a two-hour broadcast highlighting on-air personality Pierre Robert's interview with Bono of U2 during the Philadelphia Rally to Fight Global AIDS & Poverty, which occurred Sunday, May 16, 2004. The rally consisted of a diverse coalition of partner groups, including Bono's DATA (Debt AIDS Trade Africa), committed to fighting AIDS & poverty in Africa and around the world. At the conclusion of the Rally, Mr. Robert interviewed Bono and ran pieces from the interview all week, as well as Bono's entire speech from the rally.

We also use our websites to promote local events and charitable causes. For example, WMWX in Philadelphia posts the Mix 95.7 Community Event Calendar, and is currently hosting the Charlie Maxx "Bosom Buddies" Breast Cancer Awareness Resource page, where visitors to the website can learn more about the organization and make donation